

EXHIBIT J

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 IN RE: NATIONAL) MDL No. 2804
5 PRESCRIPTION OPIATE)
6 LITIGATION,) Case No.
7) 1:17-MD-2804
8)
9 THIS DOCUMENT RELATES TO) Hon. Dan A.
10 ALL CASES) Polster
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1 Wednesday, December 12, 2018

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HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
CONFIDENTIALITY REVIEW

Videotaped Deposition of MIRANDA
JOHNSON, held at 4206 South J.B. Hunt Drive,
Rogers, Arkansas, commencing at 8:51 a.m., on
the above date, before Debra A. Dibble,
Certified Court Reporter, Registered
Diplomate Reporter, Certified Realtime
Captioner, Certified Realtime Reporter and
Notary Public.

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1 Rocchino for Reed Smith, LLP, on
2 behalf of AmerisourceBergen Drug
3 Corporation.

4 VIDEOGRAPHER: The court
5 reporter is Debbie Dibble, and she
6 will now swear in the witness.

7 MIRANDA JOHNSON,
8 having first been duly sworn, was examined
9 and testified as follows:

10 DIRECT EXAMINATION

11 BY MR. INNES:

12 Q. Good morning, Ms. Johnson. My
13 name is Michael Innes. I'm with the law firm
14 Carella Byrne. I represent the plaintiffs in
15 the matter.

16 Could you state your full name
17 for the record?

18 A. Miranda Johnson.

19 Q. And who is your current
20 employer?

21 A. Walmart.

22 Q. And what is your current title?

23 A. Director on the controlled
24 substances compliance team.

25 Q. And what's your business

1 MS. TABACCHI: Object to the
2 form.

3 THE WITNESS: -- clarify?

4 MR. INNES: Sure.

5 Q. (BY MR. INNES) In your role as
6 counsel for the department of health and
7 human services, did you investigate
8 pharmaceutical companies?

9 A. No.

10 Q. Did you -- were you involved in
11 the prosecution of drug offenses?

12 A. No.

13 Q. When did you leave the office
14 of the department of human and health
15 services?

16 A. I believe it was in January of
17 2007.

18 Q. And that was to come to
19 Walmart?

20 A. Yes.

21 Q. Okay.

22 A. It might have even been later
23 than January. It was in 2007.

24 Q. So about 2007 you left and --

25 A. And came straight to Walmart.

1 Q. How did you come to make that
2 career change?

3 A. I interviewed for the position
4 and accepted the position.

5 Q. And what was the first position
6 you held at Walmart?

7 A. I was in the compliance
8 organization.

9 Q. And what was your -- what was
10 your general day-to-day function in that
11 role?

12 A. I did HIPAA compliance.
13 Billing compliance. And also did some work
14 on licensing issues.

15 Q. What type of licensing issues?

16 A. We had opticians who, in some
17 states, are licensed, and I helped support
18 what they were able to do in certain states
19 based on their licensure.

20 Q. Did you have anything to do
21 with registration with the Drug Enforcement
22 Agency?

23 A. No.

24 Q. You've held several positions
25 at Walmart. And let's see if we can

1 streamline this instead of going through each
2 one of them. I'll try and focus it.

3 What was the first role in
4 which you had responsibility dealing with
5 Schedule II or Schedule III drugs?

6 A. The role I'm currently in.

7 Q. So to be clear, the senior
8 manager at compliance assessment, that -- you
9 did no responsibilities regarding Schedule II
10 or Schedule III drugs?

11 A. Correct. No responsibilities.

12 Q. So you first entered -- well,
13 strike that.

14 When did you become the
15 director of controlled substances?

16 A. It was in October of -- I
17 believe it was 2014.

18 Q. Okay. Maybe we can -- you're
19 aware that -- are you aware that Walmart
20 submitted responses to interrogatories in
21 this case?

22 A. Yes.

23 Q. Did you have a chance to review
24 those before they were submitted?

25 A. I can't remember if I reviewed

1 them before. I don't think I did.

2 Q. I believe on that document it
3 says May of 2014 you took the role?

4 A. (Witness nods.)

5 Q. Do you think maybe it was May
6 or do you -- was it -- is it October?

7 A. So I helped support as a -- on
8 a special assignment --

9 Q. Okay.

10 A. -- some projects starting in
11 May, but I didn't have the role until October
12 of 2014.

13 Q. Okay.

14 So prior to May of 2014, did
15 you have any responsibilities regarding C-II
16 or C-III?

17 A. No.

18 Q. So your responsibilities and
19 interaction with C-II and C-III began day one
20 as director of controlled substances?

21 A. Yes.

22 Q. Can you describe your
23 responsibilities when you first took your
24 current position?

25 A. So when I first took my current

1 position, I was responsible for helping
2 support the enhancements and improvements we
3 were making to our order monitoring system.

4 Q. And what do you mean by "order
5 monitoring system"?

6 A. Our system to monitor
7 controlled substance orders.

8 Q. Okay.

9 Was that your sole function, to
10 support the enhancements and improvements to
11 the suspicious order monitoring system?

12 A. That was my main function. I
13 can't remember exactly all that I was
14 involved in, but that was my key focus when I
15 first started.

16 Q. And the suspicious order
17 monitoring program is directed towards C-II
18 and C-III products at that time?

19 MS. TABACCHI: Object to the
20 form.

21 THE WITNESS: Our order
22 monitoring system was for controlled
23 substances.

24 MR. INNES: Controlled
25 substances.

1 Q. (BY MR. INNES) Have those
2 responsibilities -- well, strike that.

3 Has your focus in that role
4 changed over time?

5 MS. TABACCHI: Object to the
6 form.

7 THE WITNESS: Can you clarify
8 what you mean by "focus"?

9 MR. INNES: Sure.

10 Q. (BY MR. INNES) How, if at all,
11 have your responsibilities in your -- in your
12 role as director of controlled substances
13 changed from day one to present?

14 A. In many ways. Just like most
15 roles do, they change and expand depending on
16 what the need is.

17 Q. Has your focus moved away from
18 suspicious order monitoring or is that still
19 your primary focus?

20 MS. TABACCHI: Object to the
21 form.

22 THE WITNESS: We no longer
23 distribute controlled substances as of
24 April 2018.

25 Q. (BY MR. INNES) And that's